

A T T O R N E Y S A T L A W

111 Great Neck Road, Great Neck, NY 11021 111 John Street, 14th Floor, New York, NY 10038 375 Cedar Lane, Teaneck, NJ 07666  
516.466.6500 | Fax: 516.466.6665 212.267.6700 973.297.1020

PLEASE REPLY TO OUR GREAT NECK OFFICE

February 21, 2008

Hon. Richard M. Berman  
United States District Court  
Southern District of New York  
500 Pearl Street  
Courtroom 14A  
New York, New York 10007

Re: Wendy Gillette v. Hilton Hotels Corporation  
Docket No.: 08 CV 0878(RMB)  
Our File No.: 716327

Honorable Sir:

Our office represents plaintiff, Wendy Gillette, in the above-captioned matter.

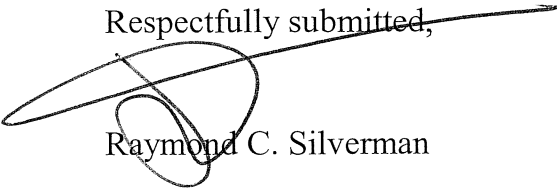
Please allow this letter to serve as a formal response to the letter sent this court by the attorneys for the defendant, Hilton Hotels Corporation, with respect to their request that the conference scheduled before Your Honor on February 29, 2008 be treated as a pre-motion conference.

It is the plaintiff's position that the plaintiff has personal jurisdiction over the defendant, Hilton Hotels Corporation, such that the plaintiff's lawsuit can be maintained in this Court. The defendant is registered with the Secretary of State of New York to do business within this State as a foreign business corporation and the plaintiff's reservations were booked through the internet on defendant's website while the plaintiff was residing in this state. Thus, it is the plaintiff's contention that the defendant had the requisite minimum contacts with the State of New York to maintain this lawsuit in this Court.

Moreover, it is the plaintiff's position that this action can be properly litigated in the United States as opposed to the Courts in Thailand. While it is true that this accident occurred at a Hilton Hotel in Phuket, Thailand, it is our position that the defendant, by itself or through its wholly owned subsidiaries, was the operator of the subject hotel property such to establish liability for the dangerous conditions which existed on the property on the date of the plaintiff's accident.

Accordingly, we await defendant's motion papers with respect to these issues so that a more formal response can be properly interposed on plaintiff's behalf.

Respectfully submitted,



Raymond C. Silverman

RCS/III  
Enclosure(s)

cc.: White Fleischner & Fino, LLP  
61 Broadway  
New York, New York 10006